



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

DMP:NJM
F. #2015R01787

*271 Cadman Plaza East
Brooklyn, New York 11201*

July 12, 2017

By FedEx and ECF

Robert J. Cleary, Esq.
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Proskauer Rose LLP
Eleven Times Square
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, some of which has been designated “Sensitive Discovery Material” under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the “February 22 Order”). This disclosure supplements the government’s earlier disclosures under cover of letters dated February 15, 2017, May 22, 2017, May 24, 2017, and June 12, 2017. The government renews its request for reciprocal discovery from the defendant.

Enclosed are the following:

- Records of Bank of America, N.A. which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ061850-DZ061953);
- Records of the Federal Reserve Bank of New York, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ061954-DZ061956);
- Redacted affidavits in support of search warrants, which have been designated Sensitive Discovery Material pursuant to the February 22 Order (DZ061957-DZ062105); and

- Per your request in your June 30, 2017 letter to the government, additional copies of previously-produced discovery materials that you indicated you were unable to open.

The government notes that it has received additional documents from entities affiliated with Liaoning Rilin Construction, (Group) Co., Ltd. (the “Rilin Entities”), but that none of the additional documents provided by the Rilin Entities appears to be relevant to the pending action against the defendant.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Very truly yours,

BRIDGET M. ROHDE
Acting United States Attorney

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Enclosures (DZ061850-DZ062105)
(DZ_VIDEO000038-DZ_VIDEO000040, DZ_VIDEO000053,
DZ_VIDEO000064)
(NYP-S_000001-NYP-S_000100)
(USR000001-USR000629, USR000636-USR000743, USR009908-
USR013342)
(WL000043-WL003626)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)